

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WALTER E. SEWELL,

a/k/a “food4less”

[DOB: xx/xx/1965]

Defendant.

No. _____

COUNTS ONE - THREE:

Publishing a Notice of Child Pornography

18 U.S.C. § 2251(d)(1)(A)

Mandatory Minimum: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: Any Term of Years or Life

Class B Felony

COUNTS FOUR - EIGHT:

Attempt to Publish a Notice of Child

Pornography

18 U.S.C. § 2251(d)(1)(A) and (e)

Mandatory Minimum: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: Any Term of Years or Life

Class B Felony

COUNTS NINE - ELEVEN:

Distribution of Child Pornography

18 U.S.C. § 2252(a)(2)

Mandatory Minimum: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: Any Term of Years or Life

Class C Felony

COUNTS TWELVE - FIFTEEN:

Attempt to Distribute Child Pornography

18 U.S.C. § 2252(a)(2) and (b)(2)

Mandatory Minimum: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: Any Term of Years or Life

Class C Felony

) COUNT SIXTEEN - EIGHTEEN:
) **Attempt to Receive Child Pornography**
) 18 U.S.C. § 2252(a)(2) and (b)(2)
) Mandatory Minimum: 5 Years Imprisonment
) NMT: 20 Years Imprisonment
) NMT: \$250,000 Fine
) Supervised Release: Any Term of Years or Life
) Class C Felony
)
) COUNT NINETEEN:
) **Possession of Child Pornography**
) 18 U.S.C. § 2252(a)(4)(B)
) NMT: 10 Years Imprisonment
) NMT: \$250,000 Fine
) Supervised Release: Any Term of Years or Life
) Class C Felony
)
) COUNT TWENTY:
) **[Forfeiture]**
) 18 U.S.C. § 2253
)
) \$100 Mandatory Special Assessment
) (Each Count, Except Count Twenty)
)
) Maximum Punishment if Convicted
) on All Counts:
)
) Life Imprisonment
) \$4,750,000 Fine
) Supervised Release: Any Term of Years or Life
) \$1,900 Mandatory Special Assessment

S U P E R S E D I N G I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly used the Kazaa file sharing program to cause the following notice to be made, printed, and published:

Pedo 12-14 yr.jpg
PBC Bro's given it to Mom&Sis
The carl family Reunion
Photo by carl
Photo by Carl
Underage Porn
Erotica;

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A).

COUNT TWO

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly used the Kazaa file sharing program to cause the following notice to be made, printed, and published:

- pedo Bro Sis 4 (1) .jpg;

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A).

COUNT THREE

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly used the Kazaa file sharing program to cause the following notice to be made, printed, and published:

more pedo mom sucks son(1).jpg;

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A).

COUNT FOUR

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to use the Kazaa file sharing program to cause the following notice to be made, printed, and published:

ray@gold 6 _10 kiddy sex preteen.jpg
13-May
how kind, his sister his leting him touch her, every where!! wish she
was my sister!!!
child porn, incest, illegal, porno, porn, sex
Lolita sex
CRIMINAL CHILD PORN!!!
Culture and Communities;

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice

was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A) and (e).

COUNT FIVE

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to use the Kazaa file sharing program to cause the following notice to be made, printed, and published:

Préteen_sex071 (1) (1) (1).jpg
Baby blowjob
two very little girls sucking dick
kiddy porn, reelkiddymov
reelkiddymov
Underage Porn
Erotica;

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A) and (e).

COUNT SIX

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to use the Kazaa file sharing program to cause the following notice to be made, printed, and published:

- pedo 13trydad.jpg
very little girl fuck
10 y/o first time
lolita child porn kiddie children naked nude sex preteen
LITTLE CHILDREN
child porn
Erotica;

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A) and (e).

COUNT SEVEN

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to use the Kazaa file sharing program to cause the following notice to be made, printed, and published:

pedo_little girl kiddy child (1).jpg
family - little girl kiddy child
pedo
caseiros

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A) and (e).

COUNT EIGHT

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to use the Kazaa file sharing program to cause the following notice to be made, printed, and published:

Kids ilegal fucking and sucking.jpg
Kids ilegal fucking and sucking
The carl family Reunion
Photo by carl

**Preteens
Underage Porn
Erotica;**

through the Kazaa file sharing program, the notice offered to display, distribute, and reproduce a visual depiction, and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction associated with the notice was of such conduct, and the notice was transported in interstate commerce by means of a computer and the Internet; all in violation of Title 18, United States Code, Section 2251(d)(1)(A) and (e).

COUNT NINE

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly distributed a visual depiction, **Pedo 12-14 yr.jpg**, in interstate commerce by means of a computer and the Internet, the production of the visual depiction involved the use of minors engaged in sexually explicit conduct, and the visual depiction was of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT TEN

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly distributed a visual depiction, - **pedo Bro Sis 4 (1).jpg**, in interstate commerce by means of a computer and the Internet, the production of the visual depiction involved the use of minors engaged in sexually explicit conduct, and the visual depiction was of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT ELEVEN

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly distributed a visual depiction, **more pedo mom sucks son(1).jpg**, in interstate commerce by means of a computer and the Internet, the production of the visual

depiction involved the use of minors engaged in sexually explicit conduct, and the visual depiction was of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT TWELVE

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to distribute a visual depiction, **ray@gold 6 _10 kiddy sex preteen.jpg**, in interstate commerce by means of a computer and the Internet, the production of the visual depiction involved the use of minors engaged in sexually explicit conduct, and the visual depiction was of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(2).

COUNT THIRTEEN

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to distribute a visual depiction, **Préteen_sex071 (1) (1) (1).jpg**, in interstate commerce by means of a computer and the Internet, the production of the visual depiction involved the use of minors engaged in sexually explicit conduct, and the visual depiction was of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(2).

COUNT FOURTEEN

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to distribute a visual depiction, **- pedo 13trydad.jpg**, in interstate commerce by means of a computer and the Internet, the production of the visual depiction involved the use of minors engaged in sexually explicit conduct, and the visual depiction was of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(2).

COUNT FIFTEEN

On or about November 10, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to distribute a visual depiction, **pedo_little girl kiddy child (1).jpg**, in interstate commerce by means of a computer and the Internet, the production of the visual depiction involved the use of minors engaged in sexually explicit conduct, and the visual depiction was of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(2).

COUNT SIXTEEN

On or about January 27, 2003 to and including January 21, 2004, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to receive visual depictions of minors engaged in sexually explicit conduct and the production of the visual depiction involved the use of minors engaged in sexually explicit conduct, and the attempt to receive the images was in interstate commerce by means of computer and the Internet, through the Kazaa file sharing program by searching for available images which contained the following terms in the images' content notice: **"teen, pedo, incest, girl, family, sex, blow job, anal, oral, breasts, Lolita, preteen sex, olson, daughter hidden, 13yo, 13yr, 14yr, 14yo, 12yo, 12yr, 11 yo, 10yo, 10yr, 15yr, webcam girls, r@ygold, preteen, early teen, young girl, hidden, daughter, babyj, baby j, vicky, cp, rape, masturbation, kds, parents, voyeur, incest, AMATEUR FACIAL, young facial, olsons, Ashley ols, webcam teen;"**all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(2).

COUNT SEVENTEEN

On or about December 30, 2003 to and including December 31, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to

receive visual depictions in interstate commerce by means of computer and the Internet, through the Kazaa file sharing program, by selecting visual depictions, including, but not limited to the following:

(pedo)Cas-3-5.mpg
Thai 6yo princess sucking Man
judo
Erotica;

and the production of the visual depictions involved the use of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(2).

COUNT EIGHTEEN

On or about December 30, 2003 to and including December 31, 2003, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly attempted to receive visual depictions in interstate commerce by means of computer and the Internet, through the Kazaa file sharing program by selecting visual depictions, including, but not limited to the following:

weird.mpg
weird
A collection of clips. Lots of action
R@YGOLD
Erotica
Amateur
pedo, kiddy, underage;

and the production of the visual depictions involved the use of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(2).

COUNT NINETEEN

On or about January 21, 2004, in the Western District of Missouri and elsewhere, **WALTER E. SEWELL**, defendant herein, knowingly possessed one or more films and other matter which contained visual depictions that had been transported in interstate commerce and which were produced using

materials which had been transported in interstate commerce by any means including by computer, and the production of the visual depictions involved the use of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct; all in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT TWENTY

The allegations contained in Counts One through Nineteen of this Indictment are realleged and incorporated by reference for the purposes of alleging a forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

As a result of the offenses alleged in Counts One through Nineteen, the defendant, **WALTER E. SEWELL**, shall forfeit any and all interest he may have in the following described personal property, which property was used or intended to be used to commit or to promote the commission of the offenses described in Counts One through Nineteen in violation of Title 18, United States Code, Sections 2251 and 2252, including but not limited to the following computers used or attempted to be used to place a notice of child pornography, distribute, receive, and possess child pornography, seized on January 21, 2004, by Agents of the Federal Bureau of Investigation:

- (1) Hewlett-Packard Pavilion 6835, Serial No. KR10822833;
- (2) Comtrade Midtower Computer, Serial No. 487333; and
- (3) HP Vectra VLi8 SF Computer, Serial No. US01057454.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

Cynthia Phillips # 6283752
Assistant United States Attorney

Date: _____
Kansas City, Missouri